



Various locations
Natalia Vasquez
1720 Sycamore Road
Montoursville, PA 17754

October 30, 2018

OCT 31 2018

Mr. Muhammad Zaman
Regional Air Quality Program Manager
Pennsylvania Department of Environmental Protection
North-central Regional Office
208 West Third St.
Suite 101
Williamsport, PA 17701

NSPS 00002

VIA CERTIFIED MAIL, RETURN RECEIPT

Re: Submittal of 40 CFR §60.5410a, 40 CFR §60.5415a, and 40 CFR §60.5420a Annual Report / Initial Notification of Compliance Demonstration for Gas Well Affected Facilities Subject to 40 CFR Part 60, Subpart OOOOa For the Period of August 3, 2017 through August 2, 2018 Chief Oil and Gas, LLC

Dear Mr. Zaman:

Chief Oil and Gas, LLC (Chief) is submitting the enclosed annual report / initial notification of compliance demonstration for gas well affected facilities subject to the requirements of 40 CFR Part 60, Subpart OOOOa – Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 (Subpart OOOOa). Chief is submitting this report for the compliance period of August 3, 2017 through August 2, 2018 in accordance with the requirements of 40 CFR §60.5410a(a), 40 CFR §60.5415a, and 40 CFR §60.5420a(b). Pursuant to 40 CFR §60.5420a(b), annual reports are due no later than the same date each year as the initial annual report. The initial annual report for Chief's affected gas well facilities was submitted on October 30, 2017. Therefore, subsequent annual reports are due no later than October 30th of each year. In addition, this submittal includes the initial annual report and initial notification of compliance demonstration for newly subject gas well facilities. This submittal was prepared by ALL4 LLC on behalf of Chief.

If you have any questions or require additional information, please contact me at (570) 651-9825 or at mfarrell@chiefog.com.

Sincerely,
Chief Oil and Gas, LLC

Margaret A. Farrell
Environmental Manager

Enclosures

Cc: Ms. Cristina Fernandez – U.S. EPA, Region III | Director, Air Protection Division

CHIEF OIL AND GAS, LLC (CHIEF)

**40 CFR PART 60, SUBPART OOOOa –
STANDARDS OF PERFORMANCE FOR CRUDE OIL AND NATURAL GAS
FACILITIES FOR WHICH CONSTRUCTION, MODIFICATION OR
RECONSTRUCTION COMMENCED AFTER SEPTEMBER 18, 2015**

ANNUAL REPORT / INITIAL NOTIFICATION OF COMPLIANCE DEMONSTRATION

40 CFR Part 60, Subpart OOOOa (Subpart OOOOa) initial compliance demonstration requirements, continuous compliance demonstration requirements, and ongoing reporting requirements are codified at 40 CFR §60.5410a, 40 CFR §60.5415a, and 40 CFR §60.5420a, respectively. Applicability determinations for these requirements to Chief's natural gas production well sites and associated compliance demonstrations are provided hereafter.

I. Notifications in accordance with 40 CFR §60.5410a(a)(1), as detailed in 40 CFR §60.5420a(a)(2)

40 CFR §60.5420a(a)(2)(i) requires owner/operators of a gas well affected facility to submit notification to the Administrator that lists the anticipated date of the well completion operation. This notification must be submitted to the Administrator no later than two days prior to the commencement of each well completion operation. Chief has constructed Subpart OOOOa gas well affected facilities during the reporting period and the gas well affected facilities are subject to the notification requirement of 40 CFR §60.5420a(a)(2)(i).

Chief's 40 CFR Part 60, Subpart OOOOa gas well affected facilities are also subject to Pennsylvania's Act 13 of 2012 (Act 13), which became effective February 14, 2012. Pursuant to §3211(f)(2) of Act 13, Chief provides 24 hours' notice to the Pennsylvania Department of Environmental Protection (PADEP) prior to cementing all casing strings, conducting pressure tests of the production casing, stimulation, and abandoning or plugging an unconventional well, via the PADEP online stimulation notification report. Furthermore, Chief provides a completion report to PADEP within 30 days after completion of the well (i.e., when the well is capable of production) in accordance with §3222(b)(3) of Act 13. Pursuant to 40 CFR §60.5420a(a)(2)(ii), Chief has met the advanced notification requirements of 40 CFR §60.5420a(a)(2)(i) by having met the advanced notification requirements of Pennsylvania Act 13.

Records of all electronic Act 13 Stimulation notifications are maintained by Chief. Copies of these notifications are available for inspection upon request. Chief will continue submitting notifications in accordance with Pennsylvania's Act 13 and Exemption No. 38(c) provisions with an effective date of August 8, 2018, document number 275-2101-003, as required.

II. Reporting in accordance with 40 CFR §60.5410a(a)(2) and 40 CFR §60.5415a(a), as detailed in 40 CFR §60.5420a(b)

40 CFR §60.5420a(b) requires owner/operators to submit annual reports providing information specified at 40 CFR §§60.5420a(b)(1) through (8) and (12). One report may be submitted for multiple affected facilities.

In accordance with 40 CFR §60.5420a(b)(11), Subpart OOOOa reports must be submitted via the U.S. Environmental Protection Agency (U.S. EPA) Compliance and Emissions Data Reporting Interface (CEDRI), unless the reporting form specific to Subpart OOOOa is not available in CEDRI at the time that the report is due. While a draft version of the Subpart OOOOa Annual Report template is available on the U.S. EPA Oil and Natural Gas Industry webpage, the final reporting form template was not available in CEDRI at the time that this report was submitted. Chief understands that facilities are not required to electronically submit the annual report until 90 days after the final template has been made available in CEDRI. Therefore, this report is being submitted in hard-copy to the appropriate delegated authority address.

General Information [40 CFR §60.5420a(b)(1)]

(i) The company name, facility site name associated with the affected facility, US Well ID or US Well ID associated with the affected facility, if applicable, and address of the affected facility or description of the site location/latitude and longitude coordinates of the site:

Company Name and Address:

Chief Oil and Gas, LLC
1720 Sycamore Road
Montoursville, PA 17754
P: 570-651-9825
F: 570-651-9828

(ii) Identification of each affected facility being included in the annual report:

Identification of each gas well affected facility is provided in Table 1 and Table 2, which document the initial annual reporting requirement for newly affected gas well facilities and the subsequent annual reporting requirement for existing gas well facilities, respectively. Other affected facilities include fugitive emissions components associated with each affected gas well facility.

(iii) Beginning and ending dates of the reporting period:

Chief is submitting this report for the period from August 3, 2017 through August 2, 2018.

Table 1
Summary of Affected Gas Well Facilities per 40 CFR §60.5420a(b)
40 CFR §60.5410a(a)(2) Initial Annual Report

Well Name ^(a)	County	Township	API Number	Latitude	Longitude
Ambrosius A-2H	Bradford	Wilmot	37-015-23296	41.59263	-76.28229
Ambrosius A-3H	Bradford	Wilmot	37-015-23297	41.59263	-76.28233
Ambrosius B-1H	Bradford	Wilmot	37-015-23308	41.58743	-76.27122
Ambrosius B-2H	Bradford	Wilmot	37-015-23309	41.58754	-76.27122
Ambrosius B-3H	Bradford	Wilmot	37-015-23307	41.58749	-76.27122
Bedford 1H	Sullivan	Elkland	37-113-20051	41.55888	-76.57050
Bedford 4H	Sullivan	Elkland	37-113-20048	41.55889	-76.57055
Beirne Green Hills Farms A-1H	Bradford	Wilmot	37-015-23334	41.72005	-76.41263
Beirne Green Hills Farms A-2H	Bradford	Wilmot	37-015-23335	41.72001	-76.41267
Beirne Green Hills Farms A-4H	Bradford	Wilmot	37-015-23336	41.72010	-76.41259
Hart North 1H	Sullivan	Elkland	37-113-20368	41.55440	-76.58919
Hart South 2H	Sullivan	Elkland	37-113-20367	41.54545	-76.58924
Hart North 3H	Bradford	Overton	37-015-23368	41.57149	-76.59084
Hart North 4H	Bradford	Overton	37-015-23369	41.57154	-76.59086
Hart North 5H	Bradford	Overton	37-015-23370	41.57160	-76.59088
Hemlock Hunting Club B-1H	Sullivan	Elkland	37-113-20357	41.56167	-76.63127
Hemlock Hunting Club B-2H	Sullivan	Elkland	37-113-20364	41.56249	-76.63119
IDC-Innes 4H	Bradford	Leroy	37-015-23337	41.70883	-76.52702
Jacobson 1H	Bradford	Franklin	37-015-23278	41.70883	-76.52702
Jacobson 2H	Bradford	Franklin	37-015-23279	41.70889	-76.52700
Lightcap North 1H	Bradford	Overton	37-015-23366	41.57169	-76.59091
Lightcap North 2H	Bradford	Overton	37-015-23367	41.57173	-76.59093
Lightcap North BRA 4H	Bradford	Overton	37-015-23166	41.66264	-76.52833
Raimo 3H	Bradford	Overton	37-015-23324	41.66258	-76.52820
Raimo 4H	Bradford	Overton	37-015-23325	41.66252	-76.52808
Raimo East 3H	Bradford	Overton	37-015-23320	41.66246	-76.52795
Raimo East 4H	Bradford	Overton	37-015-23321	41.56408	-76.60699
Savage 2H	Sullivan	Elkland	37-113-20379	41.56418	-76.60694
Savage 3H	Sullivan	Elkland	37-113-20382	41.56424	-76.60693
Savage South 2H	Sullivan	Elkland	37-113-20380	41.56413	-76.60697
Savage South 3H	Sullivan	Elkland	37-113-20381	41.56413	-76.60697
SGL-12 B North 1H	Bradford	Overton	37-015-23299	41.58928	-76.68486
SGL-12 B North 3H	Bradford	Overton	37-015-23301	41.58930	-76.68464
SGL-12 B South 1H	Bradford	Overton	37-015-23302	41.58929	-76.68475
SGL-12 B South 3H	Bradford	Overton	37-015-23304	41.59282	-76.70062
SGL-12 C East 3H	Bradford	Leroy	37-015-23332	41.59291	-76.70055
SGL-12 C East 4H	Bradford	Leroy	37-015-23351	41.59277	-76.70066
SGL-12 C West 3H	Bradford	Leroy	37-015-23333	41.59041	-76.71793
SGL-12 D East 3H	Bradford	Leroy	37-015-23362	41.59062	-76.71768
SGL-12 D East 4H	Bradford	Leroy	37-015-23338	41.59045	-76.71788
SGL-12 D West 1H	Bradford	Leroy	37-015-23339	41.59049	-76.71783
SGL-12 D West 3H	Bradford	Leroy	37-015-23363	41.59058	-76.71773
SGL-12 D West 4H	Bradford	Leroy	37-015-23362	41.59053	-76.71778
Yoder 2H	Bradford	Leroy	37-015-23305	41.67902	-76.67516
Yoder 3H	Bradford	Leroy	37-015-23306	41.67906	-76.67516

^(a) Attachment A includes records for these newly affected wells.

Table 2
Summary of Affected Gas Well Facilities per 40 CFR §60.5420a(b)
40 CFR §60.5415a(a) Subsequent Annual Report

Well Name^(a)	County	Township	API Number	Latitude	Longitude
Bahl 1H	Sullivan	Forks	37-113-20346	41.56433	-76.51339
Bahl 2H	Sullivan	Forks	37-113-20366	41.56428	-76.51341
Bahl 3H	Sullivan	Forks	37-113-20347	41.56422	-76.51339
Bailey 2H	Bradford	Overton	37-015-23266	41.57819	-76.58547
Bailey 3H	Bradford	Overton	37-015-23267	41.57817	-76.58540
Czop 2H	Sullivan	Fox	37-113-20352	41.57083	-76.74145
G&S Big Rigger 2H	Sullivan	Cherry	37-113-20282	41.53121	-76.46298
G&S Big Rigger 3H	Sullivan	Cherry	37-113-20286	41.53122	-76.46294
G&S Big Rigger 4H	Sullivan	Cherry	37-113-20285	41.53123	-76.46291
G&S Big Rigger 5H	Sullivan	Cherry	37-113-20284	41.53121	-76.46289
G&S Big Rigger 6H	Sullivan	Cherry	37-113-20283	41.53120	-76.46293
Hart South 1H	Sullivan	Elkland	37-113-20350	41.55434	-76.58899
Hart North 2H	Sullivan	Elkland	37-113-20349	41.55430	-76.58901
Hemlock Hunting Club 2H	Sullivan	Elkland	37-113-20316	41.55938	-76.64006
Hemlock Hunting Club 3H	Sullivan	Elkland	37-113-20315	41.55940	-76.64004
Hemlock Hunting Club 4H	Sullivan	Elkland	37-113-20314	41.55943	-76.64002
Hemlock Hunting Club 5H	Sullivan	Elkland	37-113-20317	41.55945	-76.64001
Hurley 2H	Sullivan	Cherry	37-113-20363	41.54232	-76.40361
Hurley 3H	Sullivan	Cherry	37-113-20362	41.54227	-76.40357
Hurley B-1H	Sullivan	Cherry	37-113-20360	41.53026	-76.41095
I. Harvey 1H	Sullivan	Elkland	37-113-20219	41.51449	-76.67982
I. Harvey 2H	Sullivan	Elkland	37-113-20220	41.51444	-76.67980
J. Brown North 2H	Bradford	Troy	37-015-23255	41.78361	-76.74361
Kuziak B-3H	Sullivan	Elkland	37-113-20305	41.54590	-76.69455
L&L Construction A-2H	Bradford	Wilmot	37-015-23281	41.58664	-76.22500
L&L Construction A-3H	Bradford	Wilmot	37-015-23282	41.58666	-76.22494
Larry Baumunk 1H	Sullivan	Fox	37-113-20354	41.57092	-76.74154
Martino 1H	Bradford	Albany	37-015-23264	41.56293	-76.46841
Martino 2H	Bradford	Albany	37-015-23283	41.56302	-76.46853
Nelson 2H	Sullivan	Forks	37-113-20377	41.55099	-76.49138
Nelson 3H	Sullivan	Forks	37-113-20378	41.55103	-76.49136
P. Cullen A-1H	Bradford	Overton	37-015-22404	41.56821	-76.54872
SA Wilson 1H	Bradford	Overton	37-015-23172	41.57936	-76.56914
SGL-12 A-2H	Bradford	Overton	37-015-23077	41.59098	-76.67517
SGL-12 A-3H	Bradford	Overton	37-015-23078	41.59098	-76.67512
SGL-12 A-4H	Bradford	Overton	37-015-23079	41.59099	-76.67506
SGL-12 A-6H	Bradford	Overton	37-015-23081	41.59100	-76.67495
Signore North 4H	Sullivan	Elkland	37-113-20337	41.54864	-76.64937
Signore North 5H	Sullivan	Elkland	37-113-20338	41.54865	-76.64941
Warburton North 1H	Sullivan	Forks	37-113-20348	41.54204	-76.53311
Yonkin 1H	Sullivan	Cherry	37-113-20358	41.54587	-76.42699
Yonkin 3H	Sullivan	Cherry	37-113-20359	41.54869	-76.42692
Yonkin B-1H	Sullivan	Cherry	37-113-20361	41.53022	-76.41091

^(a) An initial Subpart OOOOa report was previously submitted for these wells. Chief has included these gas well facilities again to meet the annual reporting requirements of 40 CFR Part 60, Subpart OOOOa.

(iv) Certification by responsible official of truth, accuracy, and completeness:

I certify that I am a certifying official as that term is defined in 40 CFR §60.5430a. I further certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Responsible Official:

Tyler Berkey

Title:

Regulatory Coordinator

Signature:

Tyler Berkey

Date:

10/30/18

Records for Well Affected Facilities [40 CFR §60.5420a(b)(2)]

(i) Records for each well completion operation:

Attachment A provides a compilation of each well completion operation conducted during the reporting period, as detailed in 40 CFR §§60.5420a(c)(1)(i) through (iv), for each new gas well affected facility summarized in Table 1. In accordance with 40 CFR §60.5375a(b), Chief completed the logs on a daily basis for the duration of each well completion operation, recording operations for only the days that activities were performed (i.e., days of inactivity are not included in the logs). Well completion logs for gas well affected facilities subject to subsequent annual reporting requirements, as summarized in Table 2, were included in a previous submittal.

(ii) Records of deviations:

In accordance with 40 CFR §60.5420a(c)(1)(ii), there were no deviations during the reporting period, as detailed in Attachment A.

(iii) Records specified in 40 CFR §60.5420a(c)(1)(vii), if applicable, that support a determination under 40 CFR §60.5432a that the well affected facility is a low pressure well as defined in 40 CFR §60.5430a:

The Chief affected gas well facilities, summarized in Table 1 and Table 2, do not meet the definition of a low pressure well, as defined in 40 CFR §60.5430a.

Records for Fugitive Emissions Components Affected Facilities [40 CFR §60.5420a(b)(7)]

(i) Records for each monitoring survey conducted for the collection of fugitive emissions components at each well site:

Attachment B provides the required records for each monitoring survey conducted for the collection of fugitive emissions components at each well site, as specified in 40 CFR §§60.5420a(b)(7)(i) – (xii).

Subpart OOOOa Requirements Not Applicable to Chief [40 CFR §§60.5420a(b)(3) through (6), (8) through (10), and (12), 60.5422a and 60.5423a]

Chief has determined that the requirements specified at 40 CFR §§60.5420a(b)(3) through (6), (8) through (10), and (12), 60.5422a and 60.5423a are not applicable to Chief's natural gas production well sites. Details of these non-applicability determinations are provided hereafter.

**STATEMENTS OF NON-APPLICABILITY OF
OTHER POTENTIALLY AFFECTED SUBPART OOOOa FACILITIES**

Compressors

40 CFR §§60.5420a(b)(3) and (4) specify reporting requirements for affected centrifugal and reciprocating compressors, respectively.

I. Regulatory Background

Pursuant to 40 CFR §§60.5365a(b) and (c), a centrifugal compressor affected facility and reciprocating compressor affected facility, for which construction, modification, or reconstruction commenced after September 18, 2015, are defined as follows:

- Each centrifugal compressor affected facility, which is a single centrifugal compressor using wet seals. A centrifugal compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.
- Each reciprocating compressor affected facility, which is a single reciprocating compressor. A reciprocating compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.

II. Compliance Approach

In accordance with 40 CFR §60.5430a, Chief owns and operates natural gas production well sites that meet the definition of a well site. Chief owns and operates reciprocating compressors at some of its well sites. Pursuant to 40 CFR §§60.5365a(b) and (c), a centrifugal compressor and/or reciprocating compressor located at a well site is not considered an affected facility and therefore is not subject to the requirements of 40 CFR

Part 60, Subpart OOOOa. Based upon the information presented above, Chief does not currently own or operate affected centrifugal compressors or reciprocating compressors.

Pneumatic Controllers

40 CFR §60.5420a(b)(5) specifies reporting requirements for affected pneumatic controller facilities.

I. Regulatory Background

Pursuant to 40 CFR §60.5365a(d)(1), a pneumatic controller affected facility, which is not located at a natural gas processing plant, is a single continuous bleed natural gas-driven pneumatic controller operating at a natural gas bleed rate greater than 6 standard cubic feet per hour (scfh) for which construction, modification or reconstruction commenced after September 18, 2015. As stated in the compressors section above, Chief's operations are defined by Subpart OOOOa as well sites.

II. Compliance Approach

Chief owns and operates natural gas-driven pneumatic controllers at its natural gas production well sites. However, Chief's pneumatic controllers do not meet the affected facility criteria specified at 40 CFR §60.5365a(d)(2). The design specifications for Chief's pneumatic controllers specify that they do not continuously bleed. Based upon the information presented above, Chief does not currently own or operate affected pneumatic controllers at their natural gas production well sites. Therefore, the pneumatic controller requirements of Subpart OOOOa do not currently apply to Chief's natural gas production facilities. Manufacturer documentation for pneumatic controllers is maintained by Chief and is available for inspection upon request.

Storage Vessels

40 CFR §60.5420a(b)(6) specifies reporting requirements for affected storage vessel facilities.

I. Regulatory Background

Pursuant to 40 CFR §60.5365a(e), a storage vessel affected facility is a single storage vessel with the potential for volatile organic compound (VOC) emissions equal to or greater than six tons per year (tpy) for which construction, modification or reconstruction commenced after September 18, 2015. In accordance with 40 CFR §60.5430a, a storage vessel is defined as follows:

- Storage vessel means a tank or other vessel that contains an accumulation of crude oil, condensate, intermediate hydrocarbon liquids, or produced water, and that is constructed primarily of nonearthen materials (such as wood, concrete, steel, fiberglass, or plastic) which provide structural support.

Chief owns and operates storage vessels, as defined above, at its natural gas production well sites. In accordance with 40 CFR §60.5365a(e), Chief understands that the potential for VOC emissions from the storage vessels must be calculated using a generally

accepted model or calculation methodology, based on the maximum average daily throughput determined for a 30-day period of production prior to the applicable emissions determination deadline specified. Chief also understands that the deadline for determining the potential to emit (PTE) VOC for storage vessels constructed during this reporting period is 30 days after startup.

II. Compliance Approach

Chief has determined the potential VOC emissions from each potentially affected Subpart OOOOa storage vessel constructed during this reporting period to be less than six tpy. Therefore, pursuant to 40 CFR §60.5365a(e), Chief does not currently own or operate any affected storage vessels at their natural gas production well sites.

As part of the Compliance Demonstration under Exemption No. 38, Chief previously submitted VOC emissions estimates to PADEP for potentially affected storage vessels that included the calculation methodology, and documented the non-applicability of Subpart OOOOa. Documentation of the storage vessel applicability determination is also maintained by Chief, and is available for inspection upon request.

Pneumatic Pumps

40 CFR §60.5420a(b)(8) specifies reporting requirements for affected pneumatic pump facilities.

I. Regulatory Background

Chief's operations are defined by Subpart OOOOa as well sites. Pursuant to 40 CFR §60.5365a(h)(2), a pneumatic pump affected facility located at a well site is a single natural gas-driven diaphragm pump for which construction, modification or reconstruction commenced after September 18, 2015.

A natural gas-driven diaphragm pump, as defined in 40 CFR §63.5430a, is a positive displacement pump powered by pressurized natural gas that uses the reciprocating action of flexible diaphragms in conjunction with check valves to pump a fluid. A pump in which a fluid is displaced by a piston driven by a diaphragm is not considered a diaphragm pump for purposes of this subpart. A single natural gas-driven diaphragm pump that is in operation less than 90 days per calendar year is not an affected facility provided the owner/operator keeps records of the days of operation each calendar year and submits the records to the U.S. EPA Administrator (or delegated enforcement authority) upon request. Any period of operation during a calendar day counts toward the 90-calendar day threshold.

II. Compliance Approach

Chief owns and operates natural gas-driven diaphragm pumps at its natural gas production well sites. However, Chief's pneumatic pumps do not meet the affected facility criteria specified at 40 CFR §60.5365a(h)(2). Specifically, Chief's pneumatic pumps do not operate more than 90 days per calendar year. Based upon the information presented above, Chief does not own or operate affected pneumatic pumps at their natural gas production well sites. Therefore, the pneumatic pump requirements of Subpart OOOOa

do not currently apply to Chief's natural gas production facilities. Chief maintains records of operation for each pneumatic pump. Documentation of operating days for each pneumatic pump is available for inspection upon request.

Closed Vent Systems

40 CFR §60.5420a(b)(12) specifies reporting requirements for closed vent systems.

I. Regulatory Background

40 CFR §60.5411a(d) specifies closed vent systems requirements for centrifugal compressor wet seal fluid degassing systems, reciprocating compressors, pneumatic pumps and storage vessels using a control device or routing emissions to a process. Owners/operators must conduct an assessment to document that the closed vent system is of sufficient design and capacity to ensure that all emissions from the affected facility are routed to the control device and that the control device is of sufficient design and capacity to accommodate all emissions from the affected facility. The assessment must be certified by a qualified professional engineer.

II. Compliance Approach

Chief does not own or operate any of the affected facilities for which closed vent systems requirements are specified in Subpart OOOOa. Chief does not use a control device or route emissions to a process for any of its affected facilities. Therefore, the closed vent systems requirements of Subpart OOOOa do not apply to Chief's natural gas production facilities.

Because Chief does not use a control device to comply with the applicable requirements of Subpart OOOOa, the requirement to conduct a performance test in accordance with 40 CFR §60.8 does not apply. Therefore, the performance test reporting requirements codified at 40 CFR §§60.5420a(b)(9) and (10) do not apply to Chief's natural gas production facilities.

Process and Sweetening Units

40 CFR §§60.5422a and 60.5423a specify reporting and additional recordkeeping requirements for process and sweetening units.

I. Regulatory Background

Pursuant to 40 CFR §§60.5365a(f) and (g), and as defined further in 40 CFR §60.5430a, a process unit affected facility and sweetening unit affected facility (for which construction, modification or reconstruction commenced after September 18, 2015), are defined as follows:

- The group of all equipment within a process unit.
 - Process unit means components assembled for the extraction of natural gas liquids from field gas, the fractionation of the liquids into natural gas

products, or other operations associated with the processing of natural gas products. A process unit can operate independently if supplied with sufficient feed or raw materials and sufficient storage facilities for the products.

- Sweetening units located at onshore natural gas processing plants that process natural gas produced from either onshore or offshore wells.
 - Sweetening unit means a process device that removes hydrogen sulfide and/or carbon dioxide from the sour natural gas stream.

II. Compliance Approach

Chief's operations do not include natural gas processing. Chief does not own or operate a process or sweetening unit. Thus, the process and sweetening unit requirements of Subpart OOOOa do not apply to Chief's natural gas production facilities.